

## **Remarks**

Claims 1, 3-10, 12-15 and 17, 18 and 24-29 are pending.

Claims 1, 5 and 6 were rejected under Section 103 as being obvious over the combination of Wood (6453127) and Wang (20030009537). Claims 7,8 13-15, 17 and 24-29 were rejected under Section 103 as being obvious over the combination of Wood, Wang and Nagal (7143109). Claims 3 and 4 were rejected under Section 103 as being obvious over the combination of Wood, Wang and Gopalan (20030076526). Claims 9, 10, 12 and 18 were rejected under Section 103 as being obvious over the combination of Wood, Wang, Nagal and Gopalan.

### *1. Plural Printers Accessing Documents Through A Common Interface.*

The system of Claim 1 includes each of a plurality of web resources on the portal page that can make use of the same interface to access the user's personal repository. Similarly, the method of Claim 15 includes the server transmitting to the client a portal Web page that includes information regarding a plurality of different Web resources that are configured to make use of the same interface to access the user's personal repository. The other independent claims, Claims 7, 24 and 25, recite a similar limitation. The Examiner asserts that Wood teaches this limitation, as follows:

"...wherein each of the web resources make use of the same interface (touch screen) in order to access a user's personal repository (col. 3, lines 11-65, user interface display page for the printer 15... reprint operation gives user the ability to select document files from storage and print hard copy')." Office Action page 3.

\* \* \*

"Wood discloses wherein each of the web resources configured to make use of the same interface in order to access the personal repository when the user is actively making use of the resource (col. 3, lines 11-65, user interface display page for the printer 15... reprint operation gives user the ability to select document files from storage and print hard copy"; col. 5, line 62 - col. 6, line 34; col. 6, lines 41-54)." Office Action page 7.

The Examiner's assertion is not correct. In Wood, the printers 15, 15' and 15" (i.e., the plural web resources) do not access print job document job storage (e.g., file server memory 39) through the user interface display page. On the contrary, the user

interface display page, delivered as a web page, gives the user access to a printer 15, 15' or 15" configuration through an ordinary web browser so no special software is needed on each user computer. This display is all about the user 11, 11' or 11" accessing a printer 15, 15' or 15" and nothing about a printer 15, 15' or 15" accessing a repository of print job documents. The "reprint" function on the user interface display page is wholly irrelevant to how the plural printers 15, 15' and 15" access print job document storage, whether for printing or reprinting.

The only thing that Wood teaches about printers 15, 15' and 15" accessing print job document storage (e.g., a user repository) is that each printer accesses its own respective file server memory 39. Wood column 2, lines 58-60 and column 4, lines 41-45. Wood decidedly does not teach each printer 15, 15' and 15" accessing the same repository through a common interface. If the Examiner disagrees, he is again respectfully requested to specifically point out **and explain in detail** those passages in Wood that teach a common interface between all of the printers 15, 15' and 15" and a user repository. Absent such a showing, the rejections should be withdrawn.

*2. It Would Not Have Been Obvious To Combine Wood And Wang.*

The Examiner argues it would have been obvious to combine Wood with Wang because Wang's portal web page "would allow the user to select a particular device of interest by clicking on the representation of the device", citing to Wang page 8, paragraph 0104. Of course, this is the primary advantage of any Web based portal page -- to allow the user to select one of the links to a web site or other resource displayed on the page. Applicants fail to see how this generalized benefit might somehow be deemed to suggest or motivate using a portal Web page with the printer schema of Wood, in which the user/client transmits documents to the printer via the Internet through a file server. Indeed, it is not at all apparent how a portal Web page could or should be used in Wood, particularly if one ignores (as one must) the Applicants' disclosure.

Upon reconsideration, the Examiner is urged to evaluate the invention of each claim as a whole. After all, the question of obviousness under Section 103 is not

whether each of the differences between the claimed invention and the prior art would themselves have been obvious, but whether the claimed invention as a whole would have been obvious. MPEP § 2141.02(I) (citing *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983) and *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983)). No showing at all has been made that core elements recited in each of the independent claims as a whole would have been obvious based on the combination of Wood and Wang.

### *3. Browsable Database Of Web Resources.*

Claim 3, depending from Claim 1, recites that the web site includes a browsable database of information regarding web resources that are available over the network and that can make use of the interface in order to access the user's personal repository. Claim 4, depending from Claim 1, recites that the web site includes a browsable database of information regarding devices each respectively represented by a web resource available over the network that can make use of the interface in order to access the user's personal repository. Claims 9-10 and 18 recite similar limitations

The Examiner cites Gopalan as teaching the browsable database limitations added in these dependent claims. In so doing, however, the Examiner has ignored the content of the claimed database -- a database of web resources that can use the common interface to access the user's personal repository. Nowhere does the Examiner address the content of the claimed database. The database 416 in Gopalan, by contrast, is a database of print jobs, not a database of printers. In the context of the claimed subject matter, the Gopalan database represents a user repository of print job documents, not printers that can access the repository of print job documents. Hence, Gopalan does not teach the further limitations of Claims 3, 4, 9-10 and 18.

### *4. Advertising Web Resources That Can Use The Common Interface.*

Claim 5, depending from Claim 1, adds the further limitation that the Web page includes an advertisement of a Web resource that can make use of the interface to access the user's personal repository. Claims 8, 13 and 17 recite similar limitations. The Examiner argues such limitations are inherent in Wood -- "web page has an

inherent functionality that includes advertising hyperlink or banner .... (fig. 4; col. 2, lines 11-17; col. 3, line 49 - col. 4, line 7)." Office Action page 4.

Even if it is assumed that the inherent functionality in a web page includes the ability to advertise a web resource, such functionality does not render obvious any and all uses of that functionality. The plain fact is that Wood does not teach or even suggest advertising any web resource on any web page, specifically not advertising a printer that can make use of a common interface to access a document server. And, such advertising is not necessary to the functionality in Wood. In fact, Wood's failure to disclose the claimed common interface makes it totally irrelevant to the further limitation of Claim 5. To establish inherency, the Examiner must show that the missing descriptive matter is necessarily present in the thing described in the reference. If the Examiner continues to feel that the advertising limitations in Claims 5, 8, 13 and 17 is inherent in Wood, then he is respectfully requested to specifically point out and explain how it is that Wood's remote web browser printer user interface display could not function without the claimed advertising.

The foregoing is believed to be a complete response to the pending office action.

Respectfully submitted,

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